

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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September 15, 2020

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: September 16, 2020

Dear Judge Gardephe:

I write to request seven temporary modifications to Mr. Rose's travel restrictions to allow him to attend weekend trainings and conferences in North Carolina hosted by Ethnicity Hair Collections (EHC), a company with which he has worked for several years. Your Honor has authorized Mr. Rose's out-of-state travel to a number of prior EHC events. See ECF No. 200 (endorsing request for business travel to North Carolina and South Carolina); ECF No. 213 (endorsing request for business travel to North Carolina, South Carolina, Virginia, Florida, and Georgia); ECF No. 249 (endorsing request for business travel to North Carolina and Washington, D.C.). All of Mr. Rose's business trips during the pendency of this case, since his initial travel request in February, have taken place without issue. I now request that he be permitted to travel as follows for additional EHC events:

- September 26-28 in Winston Salem, North Carolina
- October 9-11 in Wake Forest, North Carolina
- October 24-26 in Greenville, North Carolina
- November 7-9 in Cary, North Carolina
- November 21-23 in Fayetteville, North Carolina
- December 11-13 in Durham, North Carolina
- December 19-21 in Charlotte, North Carolina

The Government and Pretrial Services have been apprised of Mr. Rose's travel plans and intended accommodations. Both take no position and defer to the Court as to this request. Thank you for considering it.

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner, Esq.
Assistant Federal Defender
917-751-2050

cc: Mathew Andrews, Assistant U.S. Attorney
Louis Pellegrino, Assistant U.S. Attorney
Courtney DeFeo, U.S. Pretrial Officer